



**Norfolk** County Council

# **Norfolk Minerals and Waste Local Plan**

## **Main Matter 10 – Implementation and Monitoring**

**Norfolk County Council**

**Hearing Statement**

**May 2024**

**Issue:** Whether the implementation and monitoring of the Plan will be effective?

**1. Is the approach to monitoring and Implementation in the Plan robust and practicable?**

**NCC response:**

**1.1** Yes, the approach to monitoring and implementation in the NM&WLP is robust and practicable. The NM&WLP contains an 'Implementation, Monitoring and Review' table, to assess the effectiveness of the Plan policies. The table sets out the indicator, the related policy and strategic objective, the target, responsible agencies, the implementation mechanism, and the data source, to ensure the indicator is measurable and can be readily captured.

**1.2** In accordance with Section 35 of the Planning and Compulsory Purchase Act 2004 (amended by the Localism Act 2011) the County Planning Authority prepares an Annual Monitoring Report (AMR) which contains information on the extent to which the policies in the adopted Plan are being achieved. The monitoring of the indicators contained in the 'Implementation, Monitoring and Review' table in the NM&WLP will be reported in the AMR and the Local Aggregate Assessment as appropriate.

**1.3** In addition, Section 8 of the Sustainability Appraisal Report (Task B6: Monitoring proposals) (document A3.2) sets out the monitoring indicators, as required by the SEA Regulations. Monitoring of the SA will be integrated into the NM&WLP AMR. The AMR will describe any changes to the sustainability baseline arising from the implementation of the NM&WLP, and how the County Council will work to mitigate any adverse effects identified. The SA/SEA process has assisted in developing a framework for monitoring including indicators which will be used to monitor implementation of the NM&WLP, to check whether policies are delivering the predicted effects.

**1.4** The NM&WLP sets out that if the monitoring identifies any significant divergence from a trend or target required, we will seek to establish the reason(s) for the divergence from the target, and as a consequence, an intervention may be required, such as a review of the evidence base, review of a specific policy or the Plan as a whole, which will be reported in the AMR.

**2. Should the table identify any remedial/intervention action for each indicator in the event of divergence from a trend or target identified?**

**NCC response:** There is no need for the monitoring table to contain such detail. Section 35 of the 2004 Act requires Planning Authorities to produce Annual Monitoring Reports that must contain information on the extent to which the Plan policies are being achieved. Any assessment of the extent to which the plan policies are being achieved may include a considerable degree of qualitative interpretation as opposed to purely quantitative measures. The remedial action or intervention required will depend on the context and reason for the divergence from an identified trend or target which will be assessed and reported in the annual monitoring report. Therefore, in order to allow flexibility in the approach to rectification, it would be inappropriate to prescribe specific interventions to divergences within the NM&WLP. Flexibility in approach would allow for changes in circumstances through the life of the Plan, something that may not be possible if actions are fixed within the Plan itself.

**3. Is it clear how the monitoring arrangements demonstrate that the Plan takes a pro-active approach to mitigating and adapting to climate change?**

**NCC response:**

**3.1** The following monitoring indicators are included in the implementation, monitoring and review table and directly linked to Policy MW3 'Climate change mitigation and adaption':

- renewable energy generation capacity at waste management facilities,
- number of minerals and waste developments securing their energy from onsite renewable or low carbon sources,
- number of minerals and waste planning permissions granted contrary to the advice of the Environment Agency or the Lead Local Flood Authority on flood risk grounds.

**3.2** The implementation, monitoring and review table included some other monitoring indicators that are relevant to the issue of climate change mitigation and adaption. For the following indicators, waste strategic objective WSO6 and mineral strategic objective MSO8 have been included as related strategic objectives in the table, but Policy MW3 has not been included as a related policy:

- % local authority collected waste managed by each waste management method
- % waste received at waste management facilities in Norfolk that is recycled/recovered
- Waste input to landfill (tonnes)
- Distance of new mineral extraction sites and waste management facilities from main settlements and market towns.

**3.3** Therefore, we propose an additional modification to include Policy MW3 as a related policy with the implementation, monitoring and review table, in relation to those indicators. We also propose an additional modification to include a new indicator to record the percentage of planning applications determined per annum that are compliant with Policy MW3.

**3.4** In addition, the monitoring indicators for the Sustainability Appraisal include carbon dioxide emissions by Local Authority Area (data source: National Atmospheric Emissions Inventory Local Authority CO<sub>2</sub> map). However, it is relevant to highlight whilst data is available on CO<sub>2</sub> emissions from the mining and quarrying sector in the UK, we have been unable to find any published data on the current baseline of emissions from the mineral sector in Norfolk. Data is available on the emissions from landfill and 'other' waste management in Norfolk. However, emissions from transport as a whole are reported separately and therefore the proportion of emissions from transport from the minerals and waste sectors in Norfolk is not available. Some waste management facilities may also be categorised in different sectors, for example, Palm Paper Ltd is not within the waste management category and instead is a 'large industrial installation' (emitting 15 tonnes of CO<sub>2</sub> in 2021). Therefore, it is not possible to monitor and report on CO<sub>2</sub> emissions from the mineral and waste sectors in Norfolk.